

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

STATE OF MISSOURI, STATE OF  
LOUISIANA, *et al.*

*Plaintiffs,*

v.

JOSEPH R. BIDEN, JR., in his official  
capacity as President of the United States, *et*  
*al.*,

*Defendants.*

Case No. 3:22-cv-01213

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR LEAVE  
TO AMEND COMPLAINT AND FOR CLASS CERTIFICATION**

Before the Court is Plaintiffs' motion for leave to file a Third Amended Complaint adding class allegations and for class certification. After consideration, the Court hereby GRANTS Plaintiffs' Motion. This action may proceed as a class action pursuant to Rule 23(b)(2) of the Federal Rules of Civil Procedure. The classes shall be defined as set forth in Plaintiffs' Memorandum in Support of Class Certification and shall be represented by individual Plaintiffs Dr. Jayanta Bhattacharya, Ms. Jill Hines, Mr. Jim Hoft, Dr. Aaron Kheriaty, and Dr. Martin Kulldorf. Mr. John J. Vecchione of the New Civil Liberties Alliance, Ms. Jenin Younes of the New Civil Liberties Alliance, and Mr. John Burns of the Burns Law Firm shall act as counsel for both classes.

*It is so ordered.*

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_  
Hon. Terry A. Doughy, U.S. District Judge